EXHIBIT 5

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1
               UNITED STATES DISTRICT COURT
             NORTHERN DISTRICT OF CALIFORNIA
 2
 3
                  SAN FRANCISCO DIVISION
 4
 5
    In re Wells Fargo Mortgage ) Case No.
    Discrimination Litigation )3:22-cv-00990-JD
6
 7
8
9
10
                       (CONFIDENTIAL)
11
12
           VIDEOTAPED DEPOSITION OF BRYAN A. BROWN
13
14
    DATE:
                     Tuesday, October 10, 2023
15
    TIME:
                     9:59 a.m.
16
    HELD AT:
                     Regus
17
                     71 Raymond Road
18
                     West Hartford, Connecticut
19
20
21
    Reported by:
    Sarah J. Miner, RPR, LSR #238
22
23
    JOB No. 6109549
24
    PAGES 1 - 126
25
                                               Page 1
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1	high school.	10:31
2	A Completed high school.	10:31
3	Q Did you attend any college?	10:31
4	A Some college.	10:31
5	Q Where was that?	10:31
6	A Central Connecticut State University.	10:31
7	Q Do you have any degrees beyond high	10:31
8	school?	10:31
9	A No.	10:31
10	Q Can you tell me about your professional	10:31
11	background?	10:31
12	A Can you elaborate?	10:32
13	Q Sure. I know from looking at the	10:32
14	documents that you had worked at the same place for	10:32
15	a long time as of October 2020. But if you can	10:32
16	walk me through, if that was your first	10:32
17	professional job and how long you were there.	10:32
18	A I don't think I heard it mentioned it like	10:32
19	that a professional job. Yes, I guess that was my	10:32
20	first professional jobs. I had some jobs before	10:32
21	that.	10:32
22	Q I have in these depositions where they had	10:32
23	jobs at Radio Shack or Burger King. We don't need	10:32
24	to go there.	10:32
25	Where were you working in October 2020?	10:32
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1	A I was working at Kuegler Associates.	10:32
2	Q What is Kuegler Associates?	10:32
3	A A consulting engineering firm.	10:32
4	Q What do you do for Kuegler Associates?	10:32
5	A I design plumbing and electrical systems.	10:32
6	Q How long have you worked there?	10:32
7	A Since October of 2020 and still through	10:33
8	the present.	10:33
9	Q When did you start working there?	10:33
10	A Full time was October 2020 [sic]. I think	10:33
11	maybe a few months before that earlier in that year	10:33
12	as part-time and then it transitioned to full time.	10:33
13	Q Had you worked at Kuegler I thought I	10:33
14	had seen somewhere in the notes you worked at	10:33
15	Kuegler for 18 years, as of October 2020. Did I	10:33
16	miss remember that?	10:33
17	A I am sorry. 2002. Yes.	10:33
18	Q Okay. I thought something was amiss.	10:33
19	A Yes, I was very much full time at 2020.	10:33
20	Q Got it. In October 2020, did you have an	10:33
21	adjustment of your hours?	10:33
22	A Yes.	10:33
23	Q Can you tell me about that.	10:33
24	A My son my first son had just been born,	10:33
25	and I just wanted to have a few more hours at home	10:33
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1	in the morning or in the afternoon, so I just	10:34
2	reduced my hours to be able to accommodate.	10:34
3	Q Do you recall the time period that you had	
4	the reduced hours?	10:34
5	A When I started the reduced hours, probably	10:34
6	summer of 2020, just before his birth, and still	10:34
7	maintaining reduced hours.	10:34
8	Q Now?	10:34
9	A Now currently.	10:34
10	Q So starting summer of 2020 and through the	10:34
11	present?	10:34
12	A Yes.	10:34
13	Q And what are your decreased hours?	10:34
14	A I am working 32 hours.	10:34
15	Q Where do you currently reside?	10:34
16	A in Bristol.	10:34
17	Q Is that the property you sought to	10:34
18	refinance in this lawsuit?	10:35
19	A Yes, it is.	10:35
20	Q When did you buy the property originally?	10:35
21	A December of 2010 yes, December of 2010.	10:35
22	Q It is a multi-unit property. Is that	10:35
23	right?	10:35
24	A Yes.	10:35
25	Q Do you recall how much you paid for the	10:35
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1	property in 2010?	10:35
2	A Not an exact number. 204 or I think	10:35
3	the purchase was 204,000. I could be a little off.	10:35
4	I want to say the finance amount was 197,000.	10:35
5	Somewhere in the 200,000 range.	10:35
6	Q You got my next question. So you financed	10:35
7	the purchase in 2010?	10:35
8	A Yes.	10:35
9	Q Do you recall what bank you obtained a	10:35
10	loan from originally in 2010?	10:36
11	A Wells Fargo.	10:36
12	Q In 2010?	10:36
13	A Yes.	10:36
14	Q Okay. Do you recall who you worked with	10:36
15	at Wells Fargo in 2010?	10:36
16	A No. I worked with, I guess a private loan	10:36
17	officer, so I am not sure. So maybe Wells Fargo	10:36
18	purchased the loan. I really don't remember.	10:36
19	Q When you say private loan officer, do you	10:36
20	mean a broker?	10:36
21	A Yes, or someone working in a brokerage.	10:36
22	Q So that I am clear, it seems like as we	10:36
23	have been talking your memory might have gone off a	10:36
24	little bit more.	10:37
25	So you don't think you obtained the loan	10:37
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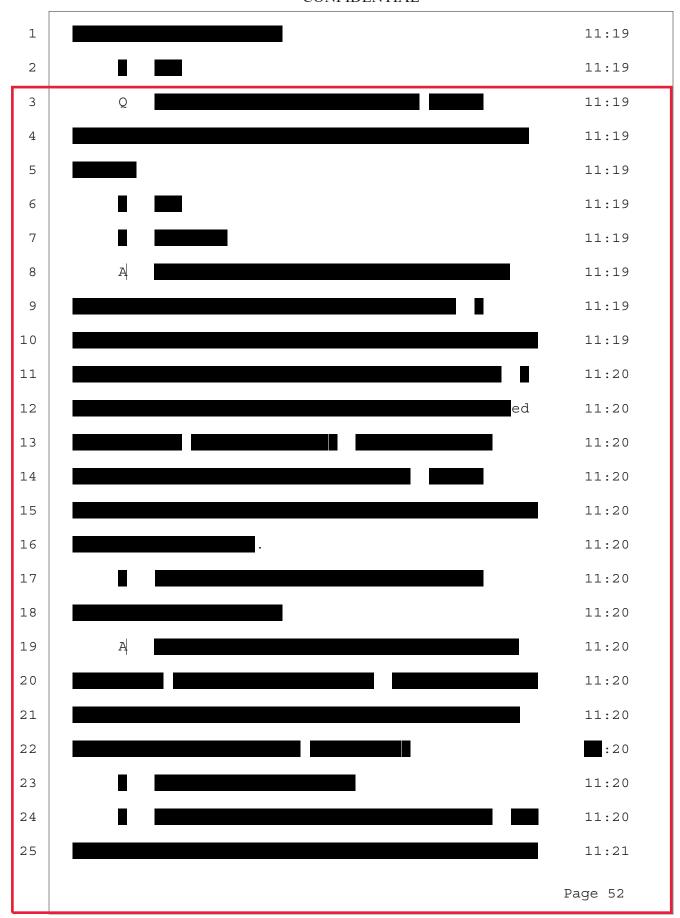
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1	in 2010 from Wells Fargo?	10:37
2	A I am not sure who or how the loan was	10:37
3	obtained. But as far back as I can remember, my	10:37
4	payments have been made to Wells Fargo.	10:37
5	Q Okay. Is that the same loan you currently	10:37
6	have on ?	10:37
7	A Yes, it is.	10:37
8	Q And what type of a mortgage product is	10:37
9	that?	10:37
10	A FHA.	10:37
11	Q What is the term of the loan?	10:37
12	A It is a 30-year.	10:37
13	Q Do you currently own any other properties	10:37
14	besides ?	10:37
15	A I do.	10:37
16	Q What properties are those?	10:37
17	A I own in Bristol,	10:37
18	Connecticut.	10:37
19	Q Any others?	10:37
20	A No.	10:37
21	Q In 2020, did you own any other properties?	10:37
22	A Yes, in 2020, in addition to those two, I	10:37
23	also owned in Plymouth,	10:38
24	Connecticut.	10:38
25	Q Let's start with , if you don't	10:38
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_		
1	Q Thomas?	11:08
2	A Thomaston Savings Bank.	11:08
3	Q Is that located here in Connecticut?	11:08
4	A Yes.	11:08
5	Q Why did you choose that bank?	11:08
6	A My partner chose that one, but they are	11:08
7	smaller I think than Webster. But I think she	11:08
8	they were in Watertown where I work and she lives,	11:08
9	and I don't know if she had some contacts or she	11:08
10	just liked that bank, but there was nothing wrong	11:08
11	with them.	11:08
12	Q Is that account now closed?	11:08
13	A Yes, it is.	11:08
14	Q When did you first become a Wells Fargo	11:08
15	bank customer?	11:08
16	A I have been a Wells Fargo bank customer	11:08
17	for longer than I think I can remember. They	11:08
18	purchased Wachovia. I was a Wachovia member, so	11:08
19	whenever that was.	11:08
20	Q Do you have any other loans besides the	11:08
2.1		
21	with Wells Fargo?	11:09
22	with Wells Fargo? A No.	11:09
22	A No.	11:09
22	A No. Q Do you have any credit cards with Wells	11:09
22 23 24	A No. Q Do you have any credit cards with Wells Fargo?	11:09 11:09 11:09

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1	I attempted to refinance.	11:21
2	Q And you said something about how since	11:21
3	Wells Fargo said no I don't want to put words in	11:21
4	your mouth. I thought you said something to the	11:21
5	effect of if Wells Fargo said no, there was no	11:21
6	reason to apply anywhere else?	11:21
7	A Yes, I felt Wells Fargo had treated me	11:21
8	fairly and gave me a no, then I just kind of I	11:21
9	just made the assumption that somebody else would	11:21
10	have said no also.	11:21
11	Q Do you recall the reasons for the decline?	11:21
12	A I didn't recall then. I do recall now.	11:21
13	Q Did you look at the denial letter	11:21
14	recently?	11:21
15	A I have seen the denial letter recently,	11:21
16	but that wasn't that wasn't where my	11:21
17	recollection stemmed from.	11:22
18	Q Where did your recollection stem from?	11:22
19	A So when I was deciding to refinance	11:22
20	, I did call the Wells Fargo lender	11:22
21	because it was a point of contact. And he	11:22
22	remembered my name, and he dug into our first	11:22
23	dealings and he is the one who said that he saw the	11:22
24	debt to income, and that was my first recollection	11:22
25	of it.	11:22
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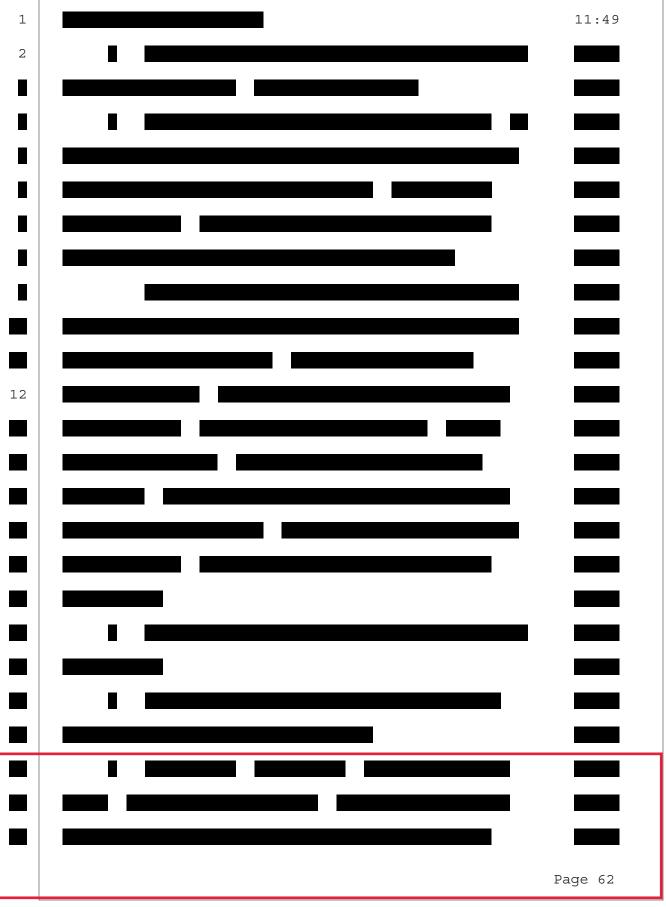
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1	Q The first Wells Fargo contact, who was	11:22
2	that?	11:22
3	A Brian Coughlin.	11:22
4	Q How did you know Brian?	11:22
5	A I only knew him through the October 2020	11:22
6	refinance attempt. He actually he cold-called	11:22
7	me, I think, and that is how I started dealing with	11:22
8	him.	11:23
9	Q In October or the fall of 2020?	11:23
10	A Yes.	11:23
11	Q So you didn't know Brian before you	11:23
12	applied in 2020?	11:23
13	A No, I did not.	11:23
14	Q Have you kept up with Brian since then?	11:23
15	A No. Only when going through that process,	11:23
16	but no.	11:23
17	Q Did you call him about ?	11:23
18	A Yes.	11:23
19	Q And that was if you can help me	11:23
20	remember. I can look through my notes. You	11:23
21	refinanced this year, January, February?	11:23
22	A So I probably would have called him	11:23
23	December of '22 or January of '23. And I don't	11:23
24	know that I called him about any property	11:23
25	specifically. I think I was just going back to one	11:23
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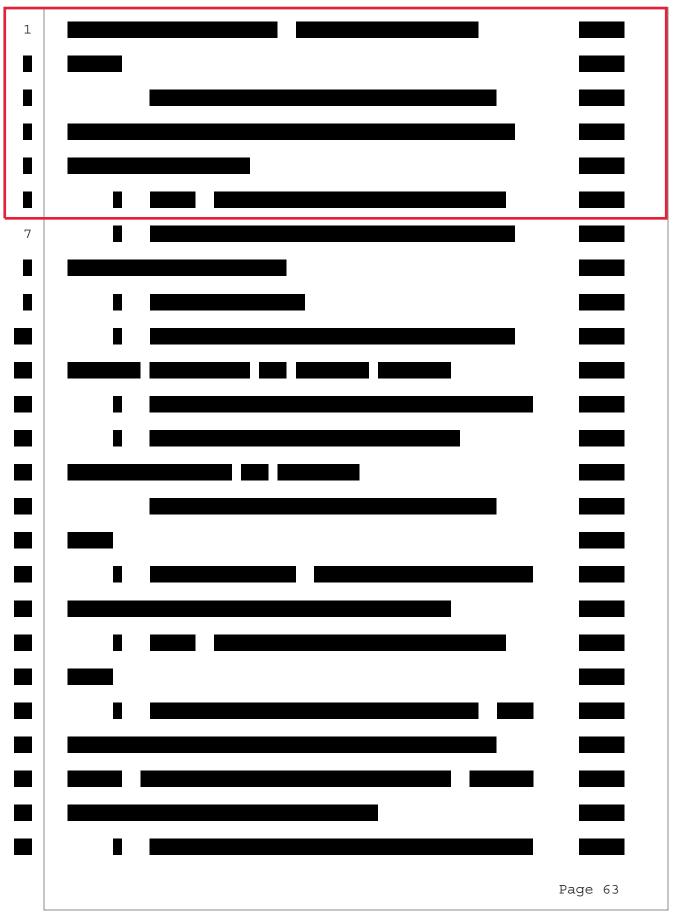
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1	of the last loan officers I dealt with and trying	11:23
2	to just discuss numbers to kind of get a feel for	11:23
3	what I could accomplish.	11:23
4	Q Okay. And how are your interactions with	11:23
5	Brian? Is he friendly, respectful?	11:24
6	A Yeah, both.	11:24
7	Q So in January or December of the recent	11:24
8	interactions, what caused him to look back at the	11:24
9	older deal?	11:24
10	A I think just we had talked a couple of	11:24
11	times. I think when he realized who I was, when I	11:24
12	told him we had spoken back in 2020, I think he	11:24
13	just went back into my file. In one of our	11:24
14	conversations, he brought that up.	11:24
15	Q When he said the reason for the decline in	11:24
16	October of 2020 was debt to income, what was your	11:24
17	reaction?	11:24
18	A I don't know. I think I just took it in	11:24
19	stride. I was more concerned with moving forward.	11:24
20	Q What I am getting after is, did that	11:24
21	reason seem inaccurate to you?	11:24
22	A No, I didn't take it as inaccurate when he	11:25
23	told me.	11:25
24	Q Okay. Does it seem inaccurate now?	11:25
25	MR. BLISS: Objection. Lack of	11:25
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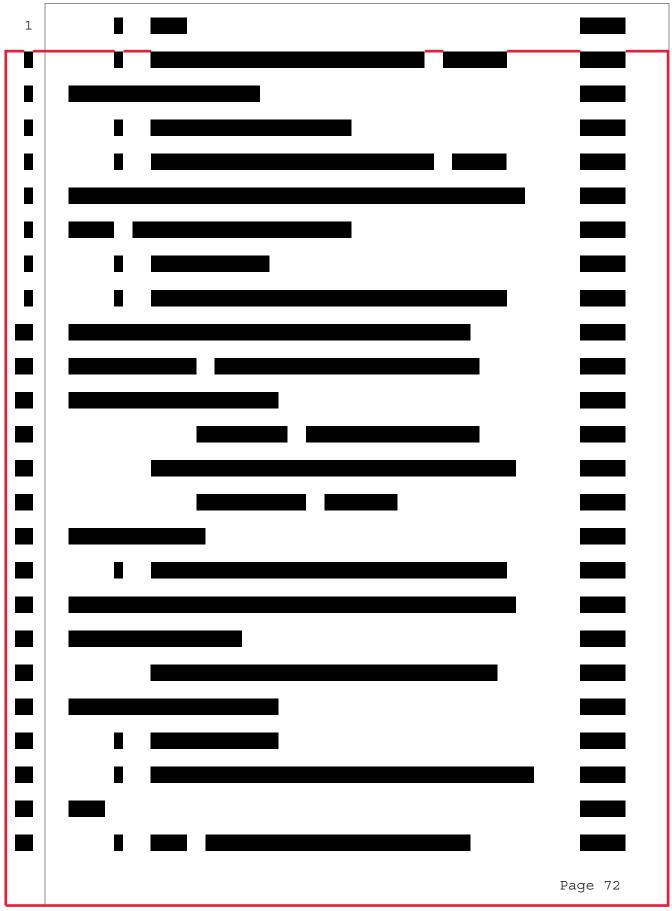
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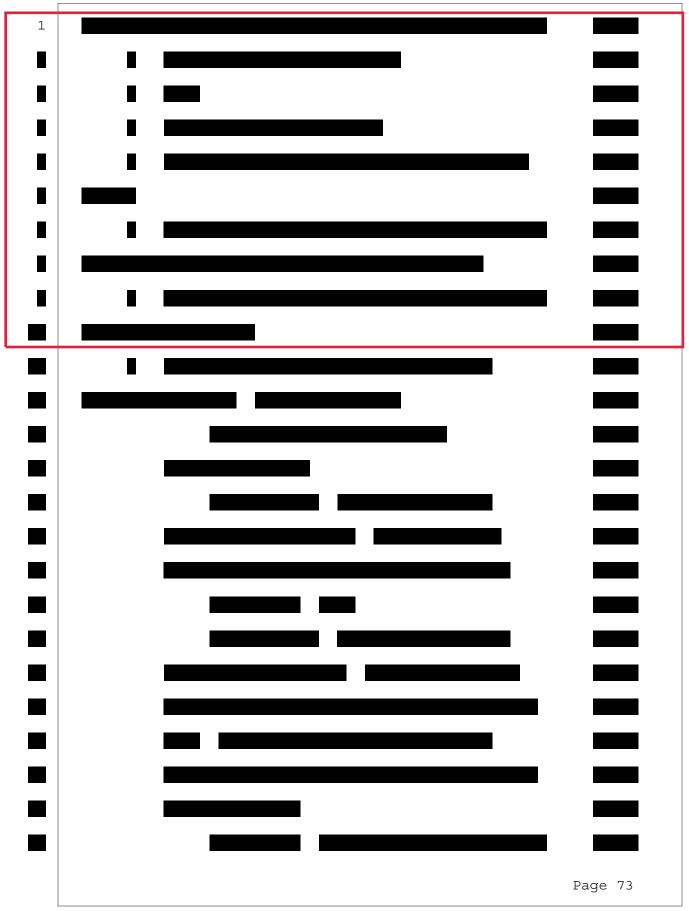
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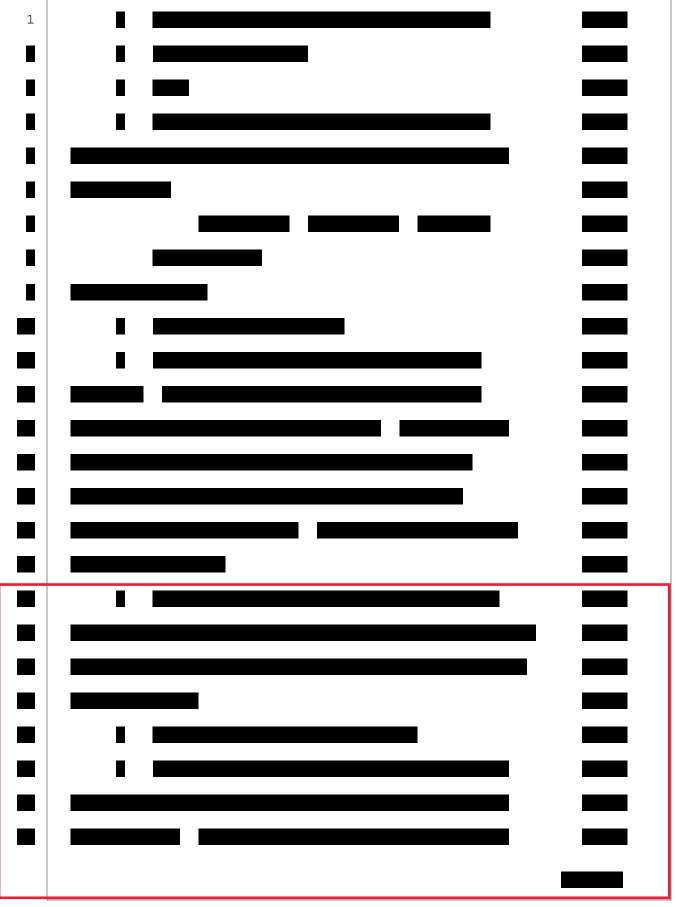
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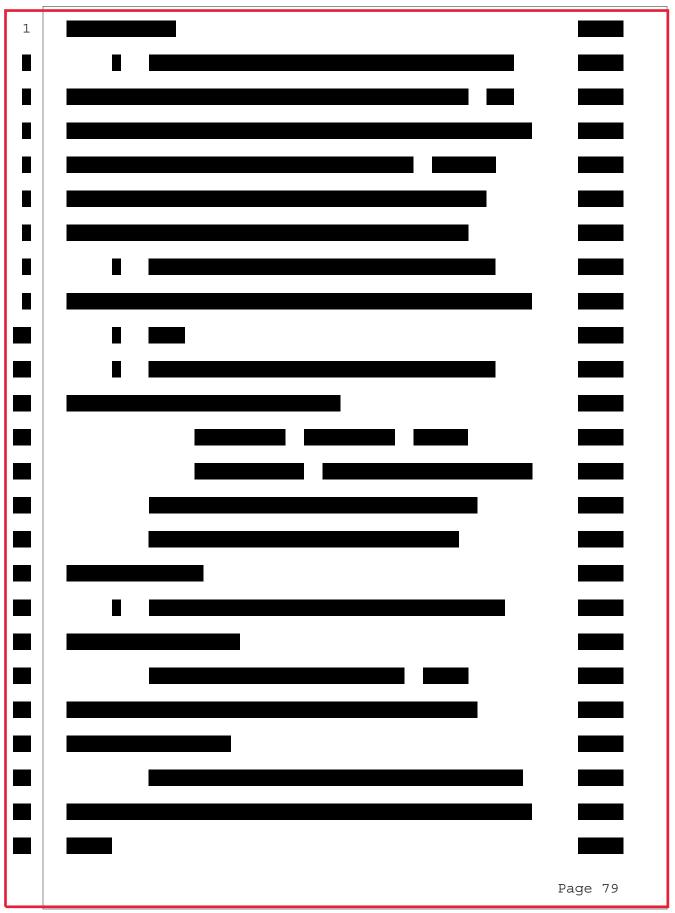
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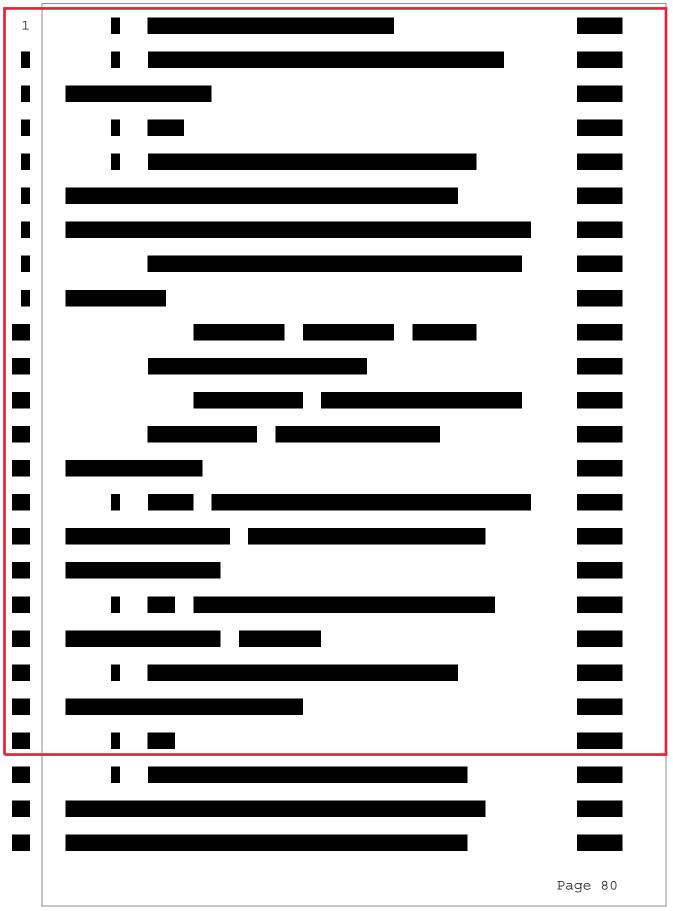
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CERTIFICATE

and qualified to administer oaths.

I hereby certify that I am a Notary Public, in and for the State of Connecticut, duly commissioned

I further certify that the deponent named in the foregoing deposition was by me duly sworn and thereupon testified as appears in the foregoing deposition; that said deposition was taken by me stenographically in the presence of counsel and reduced to typewriting under my direction, and the foregoing is a true and accurate transcript of the testimony.

I further certify that I am neither of counsel nor related to either of the parties to said suit, nor of either counsel in said suit, nor am I interested in the outcome of said cause.

Witness my hand and seal as Notary Public the 18th day of October, 2023.

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23 Notary Public

24 My Commission Expires:

arah & Minis

November 30, 2027

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